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September 5, 2023

Via ECF Filing

Hon. Kenneth M. Karas
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
Courtroom 521
300 Quarropas St.
White Plains, NY 10601

**Re: *Prolmmune v. Three Aminos, et al., Case No. 7:22-cv-08229-KMK,*
Prolmmune v. Three Aminos, et al., Case No. 7:22-cv-08227-KMK
*Prolmmune v. Three Aminos, et al., Case No. 7:22-cv-07242-KMK***

Dear Judge Karas:

We represent The ProImmune Company LLC and Albert Crum, M.D. (collectively, "ProImmune"). We write in advance of the September 6, 2023 status conference in the above-referenced matters to briefly advise the Court regarding recent developments.

First, as ProImmune previously advised the Court, Defendant Three Aminos has filed for bankruptcy. Thus, all claims against and by Three Aminos in this action are stayed under 11 U.S.C. § 363(a). The claims against Laura Lile, M.D., however, are not subject to the stay and should proceed upon the reopening of the above-referenced cases. (*See* Exhibit A [Agreed Order Resolving Motion to Enforce Automatic Stay and for Contempt].) Moreover, ProImmune has filed a motion with the bankruptcy court for an order granting relief from the automatic stay in order to continue its litigation against Three Aminos. That motion is still pending, and ProImmune will advise the Court as soon as it is resolved.

Second, once the cases are reopened, ProImmune intends to seek leave from the Court to amend its complaint in Case No. 22-cv-07242-KMK to add Lile Wellness Partners as a defendant. This amendment is in response to Dr. Lile's recent testimony in the bankruptcy proceeding that Lile Wellness Partners, a group of medical practices owned by Dr. Lile, is directly selling products that infringe on ProImmune's trademarks.

Sincerely,



Ryan Abbott
of BROWN, NERI, SMITH & KHAN LLP